

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL Docket No. 2327

The Hon. Joseph R. Goodwin

This Document Relates to All Cases

AFFIDAVIT OF RANDI S. ELLIS

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

RANDI S. ELLIS, being duly sworn, deposes and says:

1. I am an attorney at law licensed to practice law in the State of Louisiana.
2. I was admitted to the Louisiana Bar in 1997. I am in good standing and I reside in the State of Louisiana.
3. I have a full-time neutral practice and I have been appointed by several Federal Courts in Multi-District Litigation, Class Actions, and Mass Torts. I have served as mediator and Special Master for Transvaginal Mesh cases involving claims against Boston Scientific, CR Bard, Covidien, Ethicon, and Mentor.
4. Current and prior Special Master, Mediator, and Settlement Master appointments include:
 - *In re: Testosterone Replacement Therapy Litigation*, MDL No. 2545 (N.D. Ill. J.P.M.L.) Court-Appointed Settlement Master concerning products liability claims

alleging arterial cardiovascular injuries or injuries related to blood clots in the veins as a result of taking prescription testosterone replacement therapy drugs

- *In re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation*, MDL No. 2385 (S.D. Ill. J.P.M.L.) Court-Appointed Special Master for mediation and for allocation; allocated \$650 million settlement fund to claimants alleging injuries related to anticoagulant pharmaceutical use; mediated and allocated Common Benefit Fees and Expenses
- *In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010*, MDL No. 2179 (E.D. La. J.P.M.L.) Court-Appointed Mediator for personal injury claims; appointed Court-Designated Neutral for resolution of various matters; developed methodology for allocating \$2.3 billion settlement fund to thousands of Gulf of Mexico seafood harvesters who alleged economic damage as a result of the BP oil rig disaster
- *In re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Litigation*, MDL No. 2100 (S.D. Ill. J.P.M.L.) Court-Appointed Mediator and Special Master concerning products liability claims arising out of contraceptive use
- *In re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation (Vaginal Mesh)*, MDL No. 2387 (S.D. W.Va. J.P.M.L.) Mediator concerning products liability claims arising out of vaginal mesh use; Court-Appointed Special Master to allocate aggregate settlement funds for claims against Boston Scientific, CR Bard, Covidien, and Ethicon
- *In re: Chinese-Manufactured Drywall Products Liability Litigation*, MDL No. 2047 (E.D. La. J.P.M.L.) Court-Appointed Mediator; secured commitments from more than 600 defendants to global settlement; assisted Special Master with allocation responsibilities for \$1.1 billion in settlement for case in which homeowners alleged defendants were responsible for installation of defective drywall
- *In re: FEMA Trailer Formaldehyde Products Liability Litigation*, MDL No. 1873 (E.D. La. J.P.M.L.) Deputy Special Master in federal Multidistrict Litigation case to allocate multiple settlement funds to several thousand claimants who alleged chemical exposure while occupying temporary housing after Hurricane Katrina
- *In re: Denture Products Liability Litigation*, MDL No. 2051 (S.D. Fla. J.P.M.L.) selected by group of settling products liability plaintiffs to allocate aggregate settlement fund

- *Mass Depakote Litigation*, 12-cv-52, etc. (S.D. Ill.) Court-Appointed Mediator for claims alleging birth defects arising out of pharmaceutical use
- *Medtronic Infuse Litigation* (multiple jurisdictions) Mediator for products liability claims arising out of bone graft product use; as well as Court-Appointed Special Master for allocation of aggregate settlement fund
- *McClurg et al v. Mallinckrodt, Inc. et al.*, 4:12-cv-00361 (E.D. Mo.) Court-Appointed Mediator for consolidated actions seeking damages for injuries allegedly sustained as a result of multiple decades of exposure to hazardous, toxic, and radioactive substances
- *St. Jude Medical Spinal Cord Stimulator Products* (multiple jurisdictions) Mediator and Allocation Neutral for claims arising out of the use of spinal cord stimulator systems
- *In re: Swift Energy Company, et al.*, 13-05552 (E.D. La.) Mediator and Settlement Administrator for claims alleging property damage from oil release to oyster leases
- *Avandia Deceptive Marketing Litigation* (multiple jurisdictions) Mediator for products liability claims by certain attorneys general arising out of allegations of deceptive marketing of diabetes pharmaceutical
- *Ian Pollard, et al. v. Remington Arms Co., et al.*, 4:13-00086 (W.D. Mo.) Mediator for products liability claims arising out of gun use
- *Jeff Simmons, et al. v. Sabine River Authority of Louisiana, et al.*, 2:11-cv-00588 (W.D. La.) Special Master; allocated class settlement funds to claimants who alleged that they had suffered flood damages due to the opening of a nearby dam
- *John Burford, et al. v. Cargill, Inc.*, 05-0283 (W.D. La.) assisted Special Master to disburse nationwide class settlement funds to thousands of farmers in 47 states who used allegedly defective dairy feed product

5. I am familiar with the issues involved in the case captioned above and as a result of my knowledge, I can attest and affirm that there are no grounds for disqualification that would prevent me from serving as a Special Master in the above captioned matter. I have reviewed the pleadings, medical information and scientific information pertaining to mesh cases generally and

specifically as it relates to the litigation involving Ethicon, Inc. manufactured products. I will use the information and my experience in performing my duties as Special Master.

Randi S. Ellis

RANDI S. ELLIS

Sworn to and subscribed
before me, Notary Public,
this 14th day of March, 2018.

NOTARY PUBLIC

Bobby R. Lormand, Sr.
#23197